

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MUTWAKIL ELHAG,

Plaintiff,

v.

DELTA AIR LINES, INC.,

Defendant.

Civil Action No.

1:25-cv-00606-SDG-RGV

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT

Defendant Delta Air Lines, Inc. (“Delta” or “Defendant”), by and through the undersigned counsel, files this motion to dismiss with prejudice the Complaint filed in this matter by Plaintiff Mutwakil Elhag (“Plaintiff” or “Elhag”) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief may be granted and because it is untimely.

In support of this Motion, Defendant concurrently files its Brief in Support of its Motion to Dismiss Plaintiff’s Complaint.

WHEREFORE, Defendant respectfully requests that its Motion to Dismiss be granted, and that Plaintiff’s Complaint be dismissed with prejudice in its entirety.

Dated: May 30, 2025

/s/Janell M. Ahnert

Janell M. Ahnert

Georgia Bar No. 321591

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420 20th Street North, Suite 2300

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Telephone: 205.421.4700

Attorney for Defendant

Delta Air Lines, Inc.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, the undersigned hereby certifies that this pleading complies with the font requirements of Local Rule 5.1C because this document has been prepared in Times New Roman, 14-point type.

/s/ Janell M. Ahnert

Janell M. Ahnert

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2025, I electronically filed the foregoing using the Court's ECF system, which will automatically generate notice to counsel of record for all other parties to the action as follows:

Mutwakil Elhag, Pro Se
mutwakilelhag@yahoo.com

In addition, I mailed this pleading, via First Class Mail to the following address:

Mutwakil Elhag, Pro Se
650 North Point Knoll Ct.
Riverdale, GA 30274

/s/ Janell M. Ahnert

Janell M. Ahnert

Attorney for Defendant